

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792-0048 • E: [Jason@levinestein.com](mailto:Jason@levinestein.com)

May 30, 2023

**Via Electronic Filing**

The Honorable Nicholas G. Garaufis, U.S.D.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Dawkins v. Restonic Sales, Inc.*  
**Case No.: 1:22-cv-06624-NGG-LB**

Dear Honorable Judge Garaufis:

This law firm represents Defendant Restonic Sales, Inc. (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule III(E), this letter respectfully serves to request an extension of Defendant’s time to file its motion to dismiss Plaintiff’s Complaint from June 5, 2023, to, through and including, July 5, 2023.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.

If granted, this request would necessitate an extension of the corresponding briefing schedule associated with the Motion to Dismiss, as follows:

1. Defendant’s motion to dismiss to be filed on or before July 5, 2023;
2. Plaintiff’s opposition to be filed on or before August 7, 2023;
3. Defendant’s reply to be filed on or before August 21, 2023.

The basis of the request is that the undersigned will be traveling overseas from June 1, 2023, to, through and including, June 17, 2023, and will have extremely limited availability during this time.

In light of the foregoing, Defendant respectfully requests that the Court grant an extension of Defendant’s time to file its motion to dismiss Plaintiff’s Complaint from June 5, 2023, to, through and including, July 5, 2023.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein

Joshua D. Levin-Epstein, Esq.

60 East 42<sup>nd</sup> Street, Suite 4700

New York, New York 10165

Tel. No.: (212) 792-0046

Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

*Attorneys for Defendant*

VIA ECF: All Counsel